

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 18-cr-02945-WJ

SUBHANAH WAHHAJ,

Defendant.

UNOPPOSED MOTION FOR PERMISSION TO FILE OUT OF TIME

Defendant, Subhanah Wahhaj, by her counsel of record, Ryan J. Villa, and Justine Fox-Young moves the Court for permission to file her Response in Opposition to the United States' Sealed Supplemental Briefing Regarding Co-Conspirator Statements out of time, and as grounds therefore states:

1. The deadline to file Ms. Wahhaj's Response was June 23, 2022. *See* Notice [Doc. 788].
2. Counsel for Defendant prepared and filed responses to the Government's motions to exclude several Defense experts that were also due on June 23. The Response to the Government's Supplemental Briefing was overlooked and not submitted for filing.
3. Subsequently, Counsel for Defendant filed the Response on June 25, 2022. *See* Response [Doc. 819].
4. The undersigned counsel has contacted counsel for the United States, AUSA Tavo Hall regarding this Motion. Mr. Hall has indicated that the United States does not oppose this Motion.

WHEREFORE, Counsel for Ms. Wahhaj respectfully request this Court enter an Order granting her permission to file her Response out of time on June 25, 2023.

Respectfully submitted,
The Law Office of Ryan J. Villa

/s/ Ryan J. Villa

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Attorneys for Defendant Subhanah Wahhaj

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2023, I filed the foregoing electronically through the CM/ECF system, which caused counsel for the United States to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ryan J. Villa
RYAN J. VILLA